

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

TYSON FOODS, INC., et al,)

Defendants.)

4:05-CV-00329-TCK-SAJ

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THE VIDEOTAPED 30(b)(6)

DEPOSITION OF READ HUDSON, produced as a witness
on behalf of the Plaintiff in the above styled and
numbered cause, taken on the 20th day of August,
2007, in the City of Fayetteville, County of
Washington, State of Arkansas, before me, Lisa A.
Steinmeyer, a Certified Shorthand Reporter, duly
certified under and by virtue of the laws of the
State of Oklahoma.

1 later.

2 Q For purposes of control in the Tyson entities,
3 does Cobb-Vantress take direction, if you will, from
4 Tyson Food, Inc.?

5 A Yes. 10:24AM

6 Q And the other entities, Tyson Chicken, does it
7 likewise take direction from Tyson Food, Inc.?

8 A Yes.

9 Q And Tyson Poultry, Inc., does it take
10 direction from Tyson Food, Inc.? 10:24AM

11 A Yes.

12 Q Do each of these entities own birds for
13 purposes of production or is that confined to a
14 single entity that might own the bird?

15 A Which entities are you talking about? 10:24AM

16 Q The ones we just talked about. Let me ask it
17 this way: Does Tyson Food, Inc., own birds?

18 A No.

19 Q Does Tyson Chicken, Inc., own birds?

20 A Yes. 10:25AM

21 Q And Tyson Poultry, Inc., does it own birds?

22 A Yes.

23 Q And does Cobb-Vantress own birds?

24 A Yes.

25 Q And those birds would be associated with their 10:25AM

1 loans to farms in the IRW, northwest Arkansas,
2 northeast Oklahoma area?

3 **A** Yes.

4 **Q** And did you tell me when Oaklawn started as a
5 part of a Tyson entity? 10:39AM

6 **A** I don't think you asked that earlier but it
7 was the mid '90's, '95, '96.

8 **Q** We kind of talked about the high end. I want
9 to talk about starting at the other end of the
10 structure, if you would, of Tyson and tell me if I'm 10:40AM
11 correct. Starting at the bottom, basically you have
12 a grower that grows poultry?

13 **MR. GEORGE:** Object to the form. In
14 between the grower and the structure of Tyson Foods?

15 **Q** Let me ask it this way: Does Tyson Food 10:40AM
16 operate any -- own or operate any poultry growing
17 operations today? What I'm referring to as a
18 poultry growing operation is a poultry barn where
19 the birds sit and grow.

20 **A** Does Tyson Foods -- 10:40AM

21 **Q** Inc. Starting with Tyson Foods, Inc., do they
22 own or operate any poultry growing barns?

23 **A** No.

24 **Q** All right. Does Tyson Poultry, Inc., own the
25 poultry barns and the birds that are in them? 10:41AM

1 **A** A very few, yes.

2 Q Are any of those located in northwest
3 Arkansas, northeast Oklahoma?

4 **A** I don't know the answer to that.

| | | |
|---|---|---------|
| 5 | Q Does Tyson Chicken, Inc., own poultry barns | 10:41AM |
| 6 | for growing birds? | |

7 | **A** I think a very few, yes.

8 Q Are they in northwest Arkansas or northeast
9 Oklahoma area?

| | | | |
|----|----------|-------------------|---------|
| 10 | A | I don't think so. | 10:41AM |
|----|----------|-------------------|---------|

11 Q And does Cobb-Vantress own poultry growing
12 barns?

| | | |
|----|----------|------|
| 13 | A | Yes. |
|----|----------|------|

14 Q Are any of them located in northwest Arkansas
15 or the northeast Oklahoma area? 10:41AM

16 **A** I'm not sure. I know of some contract
17 production facilities they have in that area. I
18 just don't know for sure whether they actually own
19 any of those --

| | | | |
|----|---|-------|---------|
| 20 | Q | Okay. | 10:42AM |
|----|---|-------|---------|

21 **A** -- in this area.

22 MR. GEORGE: Just for the Record, we have
23 another witness coming later today that can answer
24 those questions.

| | | |
|----|------------------------|---------|
| 25 | MR. GARREN: Thank you. | 10:42AM |
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